

REMARKS

By this amendment, Applicants have amended claims 1, 6, 12, and 19. As a result, claims 1-20 remain pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the Office rejects claims 6-10, 12-14 and 16 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,185,613 (Lawson). In order to maintain a proper rejection under 35 U.S.C. § 102(b), the Office must show that a single reference discloses each feature of the claimed inventions. Applicants submit that the Office fails to show that Lawson discloses every feature of the claimed inventions.

For example, with respect to claim 6, the Office fails, *inter alia*, to show that Lawson discloses selecting, without regard to the event, the event source, and any event consumer for the event, any one of a plurality of stateless event servers to process the event as in claim 6. In Lawson, each server on a network processes events initiated by a local event producer and events received for a local event consumer. See, e.g., Lawson, col. 14, lines 33-48; col. 14, line 62-col. 15, line 13. To this extent, in Lawson, only the local server can process events for local event producers and consumers. In contrast, the method of claim 6 selects any one of a plurality of stateless event servers to process the event without regard to the event, the event source, and any event consumer for the event, and processes the event using the selected event server.

As a result, Applicants respectfully request withdrawal of the rejections of claim 6 and claims 7-10, which depend therefrom, as allegedly being anticipated by Lawson.

With respect to claim 12, the Office fails, *inter alia*, to show that Lawson discloses a plurality of stateless event servers, every stateless event server being capable of processing the event without storing state information on the processing, and without regard to the event, event source, and any event consumer for the event as in claim 12. In support of its rejection, the Office cites the servers of Lawson as allegedly disclosing the plurality of stateless event servers. However, as discussed above with respect to claim 6, the servers in Lawson only process events initiated by a local event producer and events received for a local event consumer. See, e.g., Lawson, col. 14, lines 33-48; col. 14, line 62-col. 15, line 13. To this extent, in Lawson, only the local server can process events for local event producers and consumers. In contrast, the system of claim 12 includes a plurality of stateless event servers, each of which is capable of processing the event without regard to the event, event source, and any event consumer for the event.

As a result, Applicants respectfully request withdrawal of the rejections of claim 12 and claims 13-14 and 16, which depend therefrom, as allegedly being anticipated by Lawson.

Further, the Office rejects claims 1-5, 11, and 19-20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lawson in view of U.S. Patent No. 7,313,534 (Scheer). Applicants traverse these rejections for the reasons that follow.

With respect to claim 1, the Office fails, *inter alia*, to show that the proposed combination of Lawson and Scheer teaches or suggests selecting, without regard to an event source for the event and without regard to any event consumer for the event, any one of the plurality of stateless event servers to process the event, and processing the event using the selected one of the plurality of event servers as in claim 1. Applicants note that the Office relies

on the same interpretation of Lawson as presented in rejecting claim 6. To this extent, Applicants incorporate the arguments presented above in response to the rejection of claim 6 for the similar features of claim 1. Further, Applicants submit that the proposed combination of Lawson with Scheer fails to address these deficiencies of Lawson.

As a result, Applicants respectfully request withdrawal of the rejections of claim 1 and claims 2-5, which depend therefrom, as allegedly being unpatentable over Lawson in view of Scheer.

With respect to claim 11, Applicants incorporate the arguments presented above with respect to claim 6, from which claim 11 depends. Further, Applicants submit that the proposed combination of Lawson with Scheer fails to address these deficiencies of Lawson. As a result, Applicants respectfully request withdrawal of the rejection of claim 11 as allegedly being unpatentable over Lawson in view of Scheer.

With respect to independent claim 19, Applicants note that claim 19 includes similar features as those discussed above with respect to claim 1, and that the Office relies on its rejection of claim 1 in rejecting claim 19. To this extent, Applicants incorporate the arguments presented above with respect to claim 1. As a result, Applicants respectfully request withdrawal of the rejection of claim 19 and claim 20, which depends therefrom, as allegedly being anticipated by Lawson.

Further, the Office rejects claims 15 and 17-18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lawson in view of U.S. Patent Publication No. 2004/0068568 (Griffin). Applicants incorporate the arguments presented above with respect to claim 12, from which each of these claims depends. Further, Applicants submit that Griffin fails to cure these deficiencies

of Lawson. As a result, Applicants respectfully request withdrawal of the rejections of claims 15 and 17-18 as allegedly being unpatentable over Lawson in view of Griffin.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

/John LaBatt/

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